

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Carmen Herrera, Gonzalo Ruiz, Jesus Licea
Ibanez, Concepcion Gomez, and Maria
Ramirez individually and on behalf of other
employees similarly situated, Plaintiffs
v.
Ferrara Candy Company, Defendant

Case No. 1:16-cv-10627
Judge: Hon. Virginia M. Kendall
Magistrate Judge: Hon. Sidney I. Schenkier

**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL
FOR PLAINTIFFS CARMEN HERRERA AND JESUS LICEA**

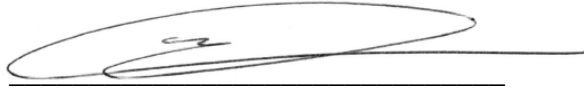
Now come Plaintiffs' attorneys of record, Valentin T. Narvaez and Raisa Alicea pursuant to Local Rule 83.17 of the Northern District of Illinois, and the corresponding Rules of Professional Conduct, and for this motion state:

1. On November 15, 2016, Plaintiffs filed this action, alleging violations of the Fair Labor Standards Act, the Illinois Minimum Wage Law, and the Illinois Wage Payment and Collection Act.
2. Valentin T. Narvaez and Raisa Alicea are the counsel of record for Plaintiffs Carmen Herrera and Jesus Licea in this matter.
3. Pursuant to Local Rule 83.17 of the Northern District of Illinois and pursuant to the Rules of Professional Conduct, Rule 1.16(b)(7), Plaintiffs' counsel seeks leave to withdraw from the representation of Plaintiffs Carmen Herrera and Jesus Licea.
4. Valentin T. Narvaez and Raisa Alicea seek leave to withdraw as counsel of record due to a breakdown in communication between counsel and the Plaintiffs. This breakdown of communication makes it impossible for counsel to effectively represent Plaintiffs in this matter.
5. Notice of this motion has been provided to Plaintiffs by U.S. mail at their last known addresses.

6. The notification of party contact information for Carmen Herrera and Jesus Licea are attached hereto as Exhibit A.

WHEREFORE, Plaintiffs' counsel requests this Honorable Court grant this Motion for Leave to Withdraw as Counsel for Plaintiffs Carmen Herrera and Jesus Licea.

Respectfully submitted on Friday, April 21, 2017.

A handwritten signature in black ink, appearing to read 'Valentin T. Narvaez', is written over a horizontal line.

Valentin T. Narvaez
Plaintiffs' Counsel

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